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EX PARTE OR LATE FILED

USWEST

WRITTEN EX PARTE

March 21, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Streeet, NW, Room 222, SC-1170
Washington, DC 20554

RE: U S WEST's Comparably Efficient Interconnection Plan for Payphone Services, CC Docket No. 96-128

Dear Mr. Caton:

On March 17, 1997, Dan Poole, BB Nugent and Elridge Stafford, representing U S WEST (USW), met with Michael Pryor, Radhika Karmarkar and Michelle Carey of the Common Carrier Bureau Policy and Program Planning Division. The purpose of this meeting was to discuss USW's Comparably Efficient Interconnection Plan for Payphone Services which was filed with the Commission on January 6, 1997. The attachment to this letter responds to questions presented to USW at that meeting.

In accordance with Commission Rule 1.1206(a)(1), two copies of this letter and attachment are being filed with you for inclusion in the public record. Acknowledgment and date of receipt of this submission are requested. A copy of this transmittal letter is provided for this purpose.

Please call if you have questions.

Sincerely,

Elridge Stafford

Attachment

cc: Mr. Michael Pryor
Ms. Radhika Karmarkar
Ms. Michelle Carey

No. of Copies rec'd 0+1
List ABCDE

FCC FOLLOW-UP QUESTIONS REGARDING
U S WEST's CEI PLAN FOR PAYPHONE SERVICES

CC Docket No. 96-128
March 21, 1997

Question: Packet Switched Network Access - How does this apply to the Millennium phones? Is the "network control center" a network feature? If so, is it available to Independent Payphone Providers (IPPs)?

Response: U S WEST Public Service's (USWPS) Advanced Payphone service which uses the Millennium brand of payphones, utilizes the U S WEST Communications (USWC) Packet Switched Network (a USWC product called Digipac) to access USWPS's Network Control Center (NCC). The Millennium payphone uses the Public Access Line (PAL) for all access. The NCC is connected to the Public Switched Telephone Network (PSTN) via Digipac. The NCC provides the functions related to the smart payphone operation of the Millennium set. The Millennium sends its queries over the PAL to the PSTN. The PSTN then routes the query via the Digipac network to the NCC. The NCC is a separate stand alone computer based system that is not a part of the public switched network or Digipac. The NCC is non-regulated payphone investment.

Question: Is the Millennium any different from Advanced payphones?

Response: No. Millennium is the equipment manufacturer's brand name for the payphone set used by USWPS for its Advanced Payphone service.

Question: What is a dataport?

Response: The dataport on USWPS payphones is a modular jack similar to that found in a home (designed to accept an RJ11 plug) which allows end users to connect a computer modem through the payphone to the public switched network. This provides the payphone user the ability to access electronic mail, the Internet, and private data bases from their portable computers. The payphones equipped with the dataport use the same basic PAL services that other payphones use to access the public switched network. The underlying Basic PAL service is a voice grade service and is not data conditioned or otherwise modified.

Question: What does "central office and operator" mean in the section of U S WEST's Comparably Efficient Interconnection Plan for Payphone Service (Plan) that briefly describes Inmate Payphone Service?

Response: Regarding the phrase "...central office and operator or premises-based call management systems..." found on page 4 of the Plan, USWC was asked to explain what is meant by "central office and operator." USWC hereby clarifies that "central office and operator" was meant to be a reference to the call screening capabilities that are available with the Basic PAL service. These screening capabilities are available to any payphone provider when it purchases Basic PAL. The operator function is limited to reacting to the screening or call blocking features that the payphone service provider has chosen.

Question: If an IPP chooses mediated access for ordering service, is there human intervention in the process of the Order? Once the order is entered into the system are all functions neutral? Does this result in service order delay? Do we have plans for direct access?

Response: This information has previously been provided in the Plan or in USWC's reply to comments on its Plan. The following is provided to further clarify the Plan.

IPP payphone service orders are input to USWC Operator Support Systems (OSS) by a USWC Interconnect Services (ICS) Center Service Delivery Coordinator (SDC) based on a telephone conversation with an IPP, a facsimile from an IPP, or an IPP's electronic mediated access request for service. USWPS service orders are input by USWPS Center sales and service personnel based on a telephone conversation with a site provider, or based on an electronic mail message or facsimile from an account manager in the field. Regardless of who initiates the service order, the flow of the order through the systems is the same.

Orders from site providers of USWPS and of IPPs will be entered into a service order system that distributes service requests to a service order processor (Processor). Once service orders are entered, all functions are neutral. The Processor redistributes orders to various downstream mechanical and manual dispatching/provisioning systems to coordinate all installation activity. From the Processor, orders are automatically routed to a mechanized facilities assignment system where loop facilities are automatically assigned using information from various other databases. Also from the Processor, orders are routed to a computer system for central office facilities where telephone numbers and central office equipment are selected on a "first-come, first-served" basis. Orders are dispatched through a work force administration system directly to a USWC technician.

USWC technicians will be dedicated either to USWPS or to USWC Local Network Operations (LNO). USWC technicians dedicated to USWPS will perform both line and set work. Because of this, USWPS appointment dates must be based on its work force levels, the number of orders, and on both the

line and set work that is required. IPP appointment dates will be based on the LNO work force levels, the number of orders, and the line work that is required. Due dates for all routine installation orders, whether for USWPS or IPPs, are negotiated with the customer before the order is entered into the Processor. They are based on standard intervals for the types and quantities of services required, not on who requests the service. Quarterly reporting requirements will assure the FCC that no discrimination exists in this area.

There is no plan to provide IPPs direct access to USWC's service ordering systems due to concerns regarding system integrity, record security, and customer privacy. IPPs can, however, request service by using mediated access to USWC's systems. In addition to requesting service, IPPs also can use mediated access to verify an address, obtain customer account and line level information, obtain a directory listing, and, as of July 1997, check facility availability.

Question: If the ownership of the site provider changes what are the provisions for contract assignment

Response: Generally, if a site provider is under contract to a payphone service provider, that contract will be assignable with a sale of the associated land or business. If assignment disputes or contract termination issues arise, they are civil law matters subject to applicable state law and subject to state court jurisdiction. Thus location contract issues are beyond the scope of this proceeding.

Question: Describe treatment of installation and maintenance work performed beyond the network interface.

Response: Expenses related to inside wire and work performed beyond the network interface will be charged to non-regulated accounts. The protector for each USWPS payphone service is located at the demarcation point (the network interface) between regulated and non-regulated service. When an IPP displaces a USWPS payphone the protector is converted to a Standard Network Interface.

Question: How will USWPS pay commissions to site providers? How will USWC pay commissions to IPPs and USWPS for operator traffic?

Response: Compensation is paid to site providers using various compensation methods dependent on site provider needs and the competitive marketplace. How USWPS pays site providers commissions is outside the scope of this proceeding.

USWC pays commissions to IPPs on 0+/0- local and intraLATA traffic through its Vendor Commission Plan (VCP). The VCP runs month-to-month (no fixed term) and pays commission between 26% and 34%. The top level commission is available for payphone providers generating $5,000 or more per month in USWC operator assisted traffic. USWPS receives compensation from USWC consistent with this Plan.

Question: Why does the number on a payphone change when converting from Basic PAL to Smart PAL?

Response: When converting from Basic PAL to Smart PAL a telephone number change is required if the last four digits of the existing telephone number is not in the 8xxx or 9xxx series of numbers. Smart PAL will only be assigned in these series of numbers. As a matter of policy, USWC makes every effort for all PAL services, regardless of who is the payphone service provider, to assign a telephone number with the last four digits in the 8xxx or 9xxx number series as a fraud protection measure.

Question: Why is a separate line required for each payphone?

Response: Four states require a separate Basic PAL line for each payphone (Idaho, Nebraska, New Mexico, Washington). These requirements were established by state regulators in their Administrative Rules that govern payphone operations. These Administrative Rules have been included in the USWC PAL tariff to ensure that subscribers were aware of the regulatory requirement.

The Smart PAL service requirements for a separate line for each payphone are related to the technical characteristic of the service. Smart PAL provides a positive or negative 130 volts to operate the coin relay of a single"dumb" payphone. If more than one "dumb" payphone is on the line, the proper operation of the coin relay may not occur. As a consequence, coins deposited by the payphone user may be either collected or returned in error.

Question: Are there state tariffs that directly relate to inmate service?

Response: Inmate tariffs do exist in the states served by USWC. They were not removed when RM-8181 deregulated inmate service because, with the pendency of the Telecommunications Act of 1996, which stated that all payphone services would be deregulated, USWC decided to delay withdrawing Inmate Service until it could withdraw all tariffs for deregulated payphone services. USWC did make all of the required accounting changes consistent with RM-8181 and has managed Inmate Service as deregulated.

Question: Inmate Services. Provision of collect calling service in confinement facilities.

Response: USWC will handle calls from Inmate facilities through its Operator Services in the same manner for IPPs and USWPS. USWC assumes the uncollectible risk which is reflected in the commissions paid through its Vendor Commission Plan. The same commission rates are paid to IPPs and to USWPS.